

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

**JEROME BLIGE,** )  
**MARSHELL BERNICE LEE,** )  
**and the ESTATE OF SAUDI** )  
**ARAI LEE, by and through** )  
**MARSHELL BERNICE LEE, its** )  
**Administrator,** )

**VERSUS** )

**NO.: 4:24-cv-00131-RSB-CLR**

)  
**ERNEST FERGUSON,** )  
**IN HIS INDIVIDUAL CAPACITY;** )  
**MACKENZIE RANDLE, IN HIS** )  
**INDIVIDUAL CAPACITY;** )  
**CITY OF SAVANNAH** )

**JURY TRIAL DEMANDED**

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**PLAINTIFFS' CONSENT MOTION TO STAY DISCOVERY**

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NOW INTO COURT comes Plaintiffs Jerome Blige, Marshell Lee, and the estate of Saudi Lee, and respectfully request a stay of discovery. Plaintiffs sought and gained the consent of all Defendants (Ernest Ferguson, MacKenzie Randle, and the City of Savannah ("City")) to this motion. As grounds, Plaintiffs state as follows:

1. The parties have diligently engaged in discovery, including scheduling the depositions of Plaintiffs Jerome Blige and Marshell Lee on April 14, and Defendants Ernest Ferguson and MacKenzie Randle on April 15, 2025. *See, e.g.*, Doc. 71 (Order permitting deposition of Mr. Ferguson, who is currently detained).

2. At the same time, Plaintiffs have pending a motion to amend their complaint a second time, Doc. 73, and Defendant City has pending a motion to dismiss Plaintiffs' first amended complaint. Doc. 67. Because no party opposes Plaintiffs' pending motion to amend, the parties

anticipate the Court granting the motion to amend, thereby mooting Defendant City's motion to dismiss.

3. Plaintiffs seek a stay of discovery until the Court's decisions on outstanding motions and a freeze of the current deadlines until the decisions. Once the Court issues its decisions, the parties can either pick up discovery with the current deadlines moved back by the amount of time the discovery was stayed, prepare to litigate another motion or motions to dismiss, or prepare another joint status report with a proposed scheduling order.

4. Should the Court prefer to schedule a status conference with the parties to discuss a path forward all counsel are available as needed. A proposed Order is attached.

WHEREFORE, Plaintiffs request that their motion be granted.

Respectfully submitted, this 7<sup>th</sup> day of April, 2025.

THE CLAIBORNE FIRM, P.C.

/s/ Will Claiborne

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**PLAINTIFFS' COUNSEL**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record and filed electronically with the Clerk of Court's CM/ECF system.

Respectfully submitted this 7<sup>th</sup> day of April, 2025.



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WILLIAM R. CLAIBORNE